

Hon. James C. Francis IV (Ret.)
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February 24, 2025

The Honorable Alvin K. Hellerstein
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: UMG Recordings, Inc. v. Uncharted Labs, Inc.
24 Civ. 4777 (AKH)

Dear Judge Hellerstein:

I am submitting this letter as my second monthly report as Special Master in this matter.

In my initial report, I indicated that the parties had resolved several issues and were working on a protocol for the examination of the data used to train the AI algorithm. On that issue, the parties made written submissions concerning areas of dispute, and I met with them on February 11. Since then, I have had several check-ins with them by email, and they have indicated progress toward a final resolution of this issue. They are scheduled to update me this Friday.

In addition, I have broached with counsel the possibility of discussing settlement of the case as a whole and have been advised that this would be premature until plaintiffs have had the opportunity to review the training data. Accordingly, we will revisit that issue at the appropriate time.

I would be happy to respond to any questions that the Court may have.

Yours very truly,

A handwritten signature in blue ink that reads "James C. Francis IV". The signature is written in a cursive style with a large initial "J" and a stylized "IV" at the end.

James C. Francis IV